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March 10, 2025

**VIA CM/ECF**

Hon. Analisa Torres  
United States District Court  
Southern District of New York  
500 Pearl Street, Room 20A  
New York, NY 10007

Re: *Fidelity & Guaranty Ins. Co. v. Accredited Surety & Casualty Ins. Co., Inc.*  
Case No. 1:23-cv-06427-AT

Dear Judge Torres:

This office represents the plaintiff, Fidelity and Guaranty Insurance Company ("Fidelity"), in connection with the above-referenced action. On January 16, 2025, Your Honor issued an Order (Document 49) requiring that the parties jointly file a proposed judgment by February 6, 2025 consistent with Your Honor's Order granting Fidelity's motion for summary judgment and denying Accredited Surety and Casualty Insurance Company's ("ASCC") cross-motion for summary judgment. On February 4, 2025, Your Honor granted a thirty (30) day extension to file a proposed judgment.

I now write, with the consent of opposing counsel, to request that the deadline to file a proposed judgment by thirty (30) additional days to April 7, 2025. Since the first extension, the parties have conducted post-summary judgment discovery on the issue of damages. The parties request this additional time to discuss the discovery with their clients and continue post-summary judgment settlement negotiations. This is the second requested extension of the Court's deadline.

Thank you for Your Honor's attention and consideration.

Respectfully submitted,

/s/ Rachel J. Carbonell

GRANTED.

SO ORDERED.

Dated: March 11, 2025  
New York, New York

  
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ANALISA TORRES  
United States District Judge